

1 JAMES P. KEMP, ESQ.
2 Nevada Bar No. 6375
3 KEMP & KEMP
4 7435 W. Azure Dr., Suite 110
5 Las Vegas, Nevada 89130
(702) 258-1183/(702) 258-6983 fax
jp@kemp-attorneys.com
Attorney for Plaintiff LAKISHA LEWIS

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LAKISHA LEWIS,)
9 Plaintiff) CDS
10 vs.) Case No.: 2:21-cv-00464-APG-VCF¹
11 SUNRISE HOSPITAL AND MEDICAL CENTER,)
12 LLC, a Delaware Limited Liability Company;)
13 DOES I-X; and, ROE Business Entities I-X,) **STIPULATION AND ORDER TO**
14 Defendants) **EXTEND TIME TO RESPOND TO**
15) **DEFENDANT'S MOTION FOR**
16) **SUMMARY JUDGMENT**
17)
18) [FIRST REQUEST]
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

Pursuant to LR IA 6-1 and LR 26-3, Defendant Sunrise Hospital and Medical Center, LLC (“Defendant”) and Plaintiff LaKisha Lewis (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to extend time for Plaintiff to Respond to Defendants’ Motion for Summary Judgment (ECF No. 33) from the current deadline of January 17, 2023 through and including January 31, 2023. This is the first request for an extension of this specific deadline. The requested extension is sought in good faith and not for purposes of undue delay. The reasons for the extension are as follows:

1. Plaintiff’s counsel was out of the country on a long-planned family commitment from December 17, 2022 through January 4, 2023.

1 Counsel are reminded that this case is assigned to Judge Cristina D. Silva. All documents must bear the correct case number 2:21-cv-00464-CDS-VCF. ECF No. 23.

1 2. Plaintiff's counsel has not had time to meet with Ms. Lewis to get her input in preparing
2 the summary judgment response and will not be able to spend sufficient time on this until
3 after January 17, 2023 due to the other deadlines set forth below and Ms. Lewis's being
4 located in North Carolina (necessitating working around time zone differences).
5
6 3. Plaintiff's counsel is experiencing a very heavy workload including another summary
7 judgment opposition in another case (*McIntosh vs. City of North Las Vegas*) now due on
8 January 23, 2023; another summary judgment opposition in another case (*Matthys vs.*
9 *Barrick Turquoise Ridge, Inc.*) now due on January 30, 2023; and an opening brief due in
10 a Ninth Circuit case (*Raffele v. VCA, Inc.*) also due on January 17, 2023. The other
11 summary judgment deadlines herein have also been recently extended from earlier
12 deadlines, but it is the appellate brief that is mostly driving the need for an extension here
13 because it is due the same date as the summary judgment response due in this case,
14 January 17, 2023.
15
16 4. Additionally, Plaintiff's counsel has had multiple administrative workers' compensation
17 hearings and appeals on January 9, 10, 12, and has others coming up on January 17, 24,
18 and 27, 2023.
19
20 5. The parties further stipulate that Defendant shall have a similar extension of the deadline
21 to file its Reply to and including **February 28, 2023**.
22
23 ///
24 ///
25 ///
26 ///
27 ///

Accordingly, additional time is needed and an extension to January 31, 2023 should be sufficient. Defendant will also have an extension of the deadline to file its Reply until February 28, 2023.

IT IS SO STIPULATED.

KEMP & KEMP, ATTORNEYS AT LAW

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

/s/ James P. Kemp

James P. Kemp, Esq.
Nevada Bar No. 006375
7435 W. Azure Drive, Ste. 110
Las Vegas, NV 89130
Attorney for Plaintiff

/s/ Anthony L. Martin

Anthony L. Martin
Nevada Bar No. 8177
Noel M. Hernandez
Nevada Bar No. 13893
10801 W. Charleston Blvd.
Suite 500
Las Vegas, NV 89135
Attorneys for Defendant

ORDER

~~IT IS SO ORDERED.~~

UNITED STATES DISTRICT JUDGE

January 17, 2023

DATE